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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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	:	CASE NO.: 18-13505
	:	
	:	CHAPTER: 13
	:	
IN RE:	:	HON. JUDGE.:
	:	Kathryn C. Ferguson
Donald Dancer	:	HEARING DATE:
	:	
	:	
	:	
Debtor(s)	:	

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NOTICE OF OBJECTION TO DEBTOR'S REQUEST FOR
EXTENSION OF LOSS MITIGATION

PLEASE TAKE NOTICE that Selene Finance LP as servicer for NJCC Fund #5 LLC ("Secured Creditor"), the holder of a mortgage on real property of the debtor(s), by and through its undersigned attorneys, hereby objects to the request to extend loss mitigation on grounds including:

1. Secured Creditor holds a mortgage on Debtor's residence which is located at 30 Amherst Road, Marlboro, NJ 07746 (the "Property"). Debtor filed the instant bankruptcy filing on February 23, 2018.
2. On May 11, 2018, 2018, this court entered an Order Granting entry into this Court's Loss Mitigation program.

3. On September 12, 2018 loss mitigation was extended through December 8, 2018.
4. On November 27, 2018 this Court entered an Order Confirming Debtor's Plan allowing the Debtor until February 1, 2019 or as extended to complete a loan modification.
5. On March 25, 2019 Debtor made the instant application for another extension of loss mitigation stating documents were submitted and are pending review.
6. As of today, Secured Creditor has advised that no documents have been received and there is no active pending loss mitigation review.
7. Debtor has had several months to supply the package to the lender but has failed to do so. If this Court were to grant Debtor(s) request to extend loss mitigation, Secured Creditor would be harmed as loss mitigation would get extended another ninety (90) days and would reward the debtor of additional time where they have spent the last loss mitigation extension period not supplying the lender the documents requested. Needless to say, an extension in this case would substantially delay the proceedings.
8. For the reasons stated above, and for any others that the Court deems fit to adopt, Secured Creditor respectfully objects to Debtor(s) request to extend loss mitigation.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

FRIEDMAN VARTOLO LLP
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New York, New York 10004
Attorneys for Selene Finance LP
as servicer for NJCC Fund #5
LLC
P: (212) 471-5100

By: /s/ Jonathan Schwalb
Jonathan Schwalb, Esq.

Date: March 27, 2019

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Caption in Compliance with D.N.J. LBR 9004-1(b)

Jonathan Schwalb, Esq.
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NJCC Fund #5 LLC

In Re:
Donald J Dancer

Case No.: 18-13505

Chapter: 13

Adv. No.: _____

Hearing Date: _____

Hon. Judge: Kathryn C. Ferguson

CERTIFICATION OF SERVICE

1. I, Theodore Weber :

☐ represent _____ in the this matter.

☒ am the secretary/paralegal for Jonathan Schwalb, Esq., who represents
Selene Finance LP in the this matter.

☐ am the _____ in the this case and am representing myself.

2. On March 27, 2019, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

- Objection to Debtor's Request for Extension of Loss Mitigation

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: March 27, 2019

/s/ Theodore Weber
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Donald J Dancer 30 Amherst Rd Marlboro, NJ 07746	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Daniel E. Straffi Straffi & Straffi, LLC 670 Commons Way Toms River, NJ 08755	Debtor(s) Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)